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August 5, 2014

BY ECF

Honorable Paul A. Englemayer

United States District Judge

Southern District of New York

Thurgood Marshall

United States Courthouse

40 Foley Square

New York, New York 10007

Re: U. S. v. Miguel Strong, et. al., 11 CR 1032/PAE

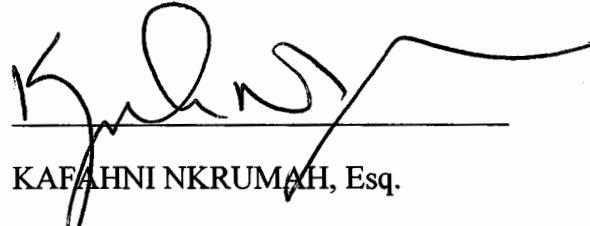
Dear Honorable Court:

I am writing this letter on behalf of the Defendant, Miguel Strong, through counsel, and respectfully request that this Honorable Court toll the filing of the government's response to defense motions filed by Mr. Strong, which are due to be filed on August 6, 2014. Mr. Strong agrees that the period of time reflected in this continuance is excludable pursuant to 18 USCA §3161(h)(7)(A) from the time period within which trial must commence as set forth in 18 USCA §3161(c)(1).

The defense requests this tolling of the government's response because Mr. Strong and the government have agreed to a plea deal in this matter and a scheduled change of plea is scheduled for August 13, 2014 at 2:00 p.m.. As a precautionary alternative, if Mr. Strong does not proceed with the scheduled change of plea, he respectfully request that this court allow the government to file their response to defense motions on August 15th, 2014, with the defense reply's due on August 18th, 2014. I have spoken with Assistant United States Attorney Rachel Maimin, counsel for the government, and Ms. Maimin consents to the above stated tolling of the filing of the government's response. There has been one other request for

the tolling of the government's response to defense motions made in this matter, and that request was granted.

Respectfully Submitted,



KAFAHNI NKRUMAH, Esq.
Counsel for Mr. Strong

cc: RACHEL MAIMIN (via e-mail)